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## DELTA STEWARDSHIP COUNCIL

October 7, 2010

**Chair**  
Phil Isenberg

**Members**  
Randy Fiorini  
Gloria Gray  
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Katherine Hart, Chair  
Central Valley Regional Water Quality Control Board  
1020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

**Interim Executive Officer**  
P. Joseph Grindstaff

Re: Proposed Permit NPDES Order #CA0077682, concerning the Sacramento County  
Regional Sanitation District Wastewater Treatment Plan Discharge

Dear Chair Hart:

The Delta Stewardship Council is directed to adopt a legally-enforceable Delta Plan no later than January 1, 2012. As part of that Delta Plan, we are required to follow the coequal goals identified in statute (Water Code Sec. 85054), and the eight Objectives determined by statute as essential to reaching those coequal goals (Water Code Sec. 85020).

One of the key elements of our enabling legislation is to 'improve water quality to protect human health and the environment consistent with achieving water quality objectives in Delta.' (Water Code Sec. 85020(e)).

Delta Lead Scientist Cliff Dahm, who advises the Council, has sent a memo advising me that the Proposed Permit is consistent with the best available science and, when implemented, should improve water equality and the Delta ecosystem. A copy of his memo is attached.

Personally, I agree with this conclusion by Dr. Dahm. The Council, however, meets after your deadline for comments. Dr. Dahm will present his conclusions to the Council at our next meeting on October 28-29 and I am confident that the Council will concur with his judgment.

Please call me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Phil Isenberg', with a long horizontal line extending from the end of the signature.

Phillip L. Isenberg, Chair

Attachment: Memo of Dr. Cliff Dahm

*"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."*

*— State Water Code §85054*

cc: Members of the Central Valley Regional Water Quality Control Board  
Members of the Delta Stewardship Council  
Senator Darrell Steinberg, President Pro Tempore, California State Senate  
Speaker John Perez, California State Assembly  
Lester Snow, Secretary California Natural Resources Agency  
Marc Cowin, Director Department of Water Resources

October 7, 2010

TO:

Phil Isenberg  
Chair, Delta Stewardship Council

FROM:

Cliff Dahm  
Lead Scientist

SUBJECT: Tentative Waste Discharge Requirements Renewal (NPDES NO. CA0077682) for Sacramento Regional Wastewater Treatment Plant (SRWTP) dated 3 September 2010

Dear Phil,

With the help of Delta Science Program staff, I have reviewed the subject permit and offer the following comments. While there are other issues and proposed discharge limits included in the tentative permit, I am restricting my comments to the proposed total ammonia limits and associated issues. I have attached a summary table of specific comments on the permit in the format requested by the Regional Water Board. It is my professional opinion that the total ammonia limits proposed in the tentative permit are justified based on the available science.

I commend the staff of the Regional Water Board on their comprehensive assessment of the issues associated with the Sacramento Regional Wastewater Treatment Plant (SRWTP) and agree that there is sufficient evidence of total ammonia and nitrogen impairment of the aquatic ecosystem to warrant the limits in the tentative permit. The suggestion by the discharger that there is sufficient assimilative capacity in the Sacramento River to absorb 14 tons of ammonia per day runs counter to the mounting chemical and biological evidence downstream of the discharge. This discharge affects the largest freshwater input to the Delta and is therefore of critical importance to the aquatic life dependent on the Delta including several threatened and endangered fish species.

Science supports the concept that there are multiple stressors affecting the Delta ecosystem but science also shows that the current nutrient loading (especially total ammonia) may be one of the most important of these stressors. To reverse the decline in the health of the Delta ecosystem it will take the combined efforts of many agencies to reduce the impacts of these multiple stressors. Solutions addressing a single stressor such as increasing flows, reducing the population of an invasive species, or increasing available habitat are unlikely to be successful in isolation. There is no time like the present to start reducing the impacts of total ammonia and other pollutants on the aquatic ecosystems of the Delta.

Since the SRWTP came on line in 1982, this plant has played an important role in meeting the wastewater treatment needs of the Sacramento community and in protecting the water quality of the Sacramento River. The community, however, has grown, discharge loads have increased, the Delta ecosystem has changed, and our understanding of the Delta ecosystem has improved. The Sacramento Regional County Sanitation District contends that because of the significant dilution afforded by the flows of the Sacramento River, the plant should be allowed more lenient discharge limits than other wastewater treatment plants in the region. Evidence, however, points to discharge from the SRWTP affecting the composition of the phytoplankton of the Delta waterways, contributing to harmful algal blooms in the Delta, and influencing the aquatic plant community within the Delta. It is time to make the SRWTP a key component of the overall Delta solution by bringing current treatment technology into the 21<sup>st</sup> century.

Please let me know if you or the Council have any questions regarding these comments.